

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHARLES LANGONE, as FUND MANAGER)
of the NEW ENGLAND TEAMSTERS AND)
TRUCKING INDUSTRY PENSION FUND)

Plaintiff,)

v.)

STAMPRETE OF RHODE ISLAND, STAMP)
CRETE OF RHODE ISLAND, INC.)
AND STAMPED CONCRETE, INC.)

Defendant,)
_____)

C.A. No. 04cv11125 NG

JOINT STATEMENT AND PROPOSED PRETRIAL SCHEDULE

Pursuant to the Notice of Scheduling Conference issued by this Court, counsel for the parties have conferred for the express purpose of (1) preparing an agenda of matters to be discussed at the October 29, 2004 scheduling conference, (2) preparing a proposed pretrial schedule for the case that includes a plan for discovery, and (3) considering whether they will consent to trial by magistrate judge.

As a result of said conference between counsel, parties have agreed, subject to Court approval, to prepare for trial in accordance with the following proposed pretrial schedule.

1. All discovery shall be completed by April 29, 2005.
2. Parties shall file any and all Rule 56 Motions for either partial or total summary judgment by June 15, 2005.

For the Plaintiff,

CHARLES LANGONE, as FUND MANAGER
Of the NEW ENGLAND TEAMSTERS AND
TRUCKING INDUSTRY PENSION FUND,

By his Attorney,

/s/ Catherine M. Campbell
Catherine M. Campbell
BBO #549397
Feinberg, Campbell & Zack, P.C.
177 Milk Street
Boston, MA 02109
(617) 338-1976

Dated: October 22, 2004

For the Defendants,

STAMPRETE OF RHODE ISLAND,
STAMP CRETE of RHODE
ISLAND, INC., and
STAMPED CONCRETE, INC.
By their Attorney,

/s/ Bruce E. Thompson
Bruce E. Thompson, Esq.
Casey and Thompson, PC
8 North Main Street, Suite 204
Attleboro, MA 02703
(508) 222-2332

Dated: October 21, 2004